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July 24, 2006

RECEIVED

Ms. Marlene H. Dortch, Secretary Federal Communications Commission The Portals Building, Room TW-B204 445-12th Street, S.W. Washington, D.C. 20554 现几 2 4 2006

Federal Communications Commission Office of Secretary

Re:

Stations WEDH-DT and WEDN-DT

FCC Files No. BPEDT-19990113KG and BMPEDT-20031008AAT

MB Docket No. 04-184 (Norwich, Connecticut)

MB Docket No. 03-15 1

Dear Ms. Dortch:

Connecticut Public Broadcasting, Inc. ("CPBI"), by counsel, files this response to the "Ex Parte Submissions" of American Broadcasting Companies, Inc. (ABC) and "Entravision Holdings, LLC (Entravision)" filed June 12, 2006 and July 5, 2006, respectively.

Without justification or leave, ABC has fired yet another volley in its never-ending fight against the proposal made by Connecticut Public Broadcasting in 2003 for the repurposing of DTV channels licensed to CPBI in Hartford and Norwich, Connecticut. Without justification or leave, Entravision has filed its own "support" for ABC's position.

The clear case for grant of the above-referenced applications, and for completion of the rulemaking, was placed before Commission staff during an ex parte meeting of May 23, 2006, and an appropriate ex parte notice was filed after the meeting by undersigned counsel.²

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¹ FCC staff asked that a copy of the previous filing made by CPBI regarding the subject matter of the present filing be filed in Docket 03-15, and so this filing in rebuttal to filings of ABC and Entravision (as argued below unauthorized with respect to Docket 04-184) has also been lodged in this proceeding.

² CPBI's filing was made with the advance approval of FCC staff, and so notwithstanding the "restricted" ex parte status of the Norwich rulemaking proceeding, the filing conformed to the ex parte rules, 47 C.F.R. Section 1.1204 (a)(10). In response to an email request from FCC staff, the ex parte notice was also filed electronically in MM Docket 03-15 (letter of undersigned counsel dated May 25, 2006). Neither ABC nor Entravision recites seeking or receiving staff approval for their filings, which therefore violate ex parte rules.

CPBI Followed the Rules in its DTV Channel Exchange Proposal

CPBI filed its applications in 2003 for modification of Stations WEDH, Hartford, and WEDN, Norwich under the rules for DTV channel exchanges (DCE) adopted by the FCC in 1997, as clarified in 1998. The 1998 clarification provided for the exchanges of allotment on an intra-community, intra-market or intra-market basis "provided that the exchanges do not result in additional interference beyond our de minimus standard to other stations...". *Allocation Reconsideration* at 7477. The Commission intended these procedures to afford broadcasters "as much flexibility as possible." While the situation anticipated in most cases involved two or more licensees, nothing in the rules prohibited a single licensee from conducting an exchange of channels among its own stations. These rules have not been changed, and technical staff at the May 23, 2006 meeting confirmed these rules were the relevant rules to the processing and grant of pending applications.

In the application for use of Channel 45 by WEDH-DT, Hartford, CPBI demonstrated that no interference was caused beyond the de minimus amount permitted by the rules.⁴ That standard was clearly stated as "no more than an additional 2 percent of the population served by another station being subject to interference," 47 C.F.R. Section 73.622(c)(3). The station population values for DTV services contained in Appendix B of the Allocation Reconsideration Order were used for the analysis of the DTV channel exchange, and this analysis showed the interference created was permissible under the de minimis standard. The "DTVPLN" record for Station WABC-DT was analyzed and it was determined that the interference was only 1.238% of the baseline population. The "DTVPLN" used for Station WUVN (then call sign WHCT) was analyzed and it was determined that the interference was only 0.561% of the baseline population (See Exhibit One, attached, an excerpt from the application).

CPBI representatives at the May 23, 2006 meeting understood FCC technical staff to express agreement with the exchange applications' compliance with all FCC technical rules. Notwithstanding, following a discussion of the technical basis for the objections of ABC and Entravision, Media Bureau management expressed a hope that ABC, Entravision and CPBI could present a settlement proposal for approval. CPBI's representatives understood that engineers for ABC in attendance at the meeting would establish contact for the purpose of exchanging information regarding the reasons why

In re Advanced Television Systems and Their Impact upon the Existing Broadcast Services, Sixth Report and Order, MM Docket No. 87-268, 12 FCC Rcd 14588 (1997) as modified by Memorandum Opinion and Order on Reconsideration of the Sixth Report and Order, MM Docket No. 87-268, 13 FCC Rcd 7418, 7477-78, ¶ 146 (1998)(Allocation Reconsideration).

⁴ "Technical Statement" of du Treil, Lundin & Rackley, Inc., June 9, 2003, Figure 4. Following a change in the transmission plant, CPBI submitted an amendment which similarly showed only de minimus interference to WABC-DT and WUVN-DT "Technical Statement" of du Treil, Lundin & Rackley, Inc., March 9, 2004, Figure 4. Interference to WUVN-DT remained the same and interference to WABC-DT increased slightly to 1.023 percent.

the technical showings presented so far to the FCC regarding Channel 45 in Hartford were invalid. Instead, ABC filed its unauthorized letter of June 12, 2006, containing restatements and rehashing of the same discredited technical arguments it had previously offered.

The 0.1 Interference Standard Applicable to NCAs Do Not Apply to CPBI's DCE Applications

ABC argues that the proper standard to apply to these applications is the 0.1 NCA standard which applies to "Negotiated Channel Agreements (NCAs)," as permitted first by the FCC in 2005 pursuant to the Second Periodic DTV Review. ABC might be right had the FCC denied or dismissed CPBI's DTV channel exchange applications prior to the filing of DTV channel elections. But the FCC has left these applications pending, notwithstanding CPBI's efforts to secure grant. ⁵ ABC and Entravision filed their channel elections knowing that the CPBI applications were pending, and that those elections would be subject to FCC final action on those applications. The FCC staff has seemingly acknowledged this special circumstance in that it is considering ABC's extraordinary waiver request in connection with its contingent election of Channel 7 as its eventual DTV home – apparently the only licensee in the country which is being permitted to argue contingently for two channels.

The ability for licensees to elect Tentative Digital Assignments pursuant to NCAs was adopted as an alternative to the channel election process and incorporated into the FCC's multi-step channel election plan, with the end goal of establishing a post-transition DTV Table of Allotments. The NCA policies have permitted the sale of channel rights by those incumbent "in-core" NTSC licensees which had been awarded "in-core" DTV channels. Needless to say, because NCA procedures were adopted after CPBI filed its applications pursuant to the DCE procedures, NCA policies cannot and should not be applied. CPBI deserves processing under the DCE rules - as they applied in 2004 and as they remain unchanged to date.

Grant of the Channel Exchange Applications Was Assumed In the Submission of the Petition for Rulemaking for the Ultimate Assignment of Channel 9 in Norwich

ABC also addresses the Norwich rulemaking proceeding and states that "WEDN would no longer have any rights to channel 45" if it is granted. ABC has the wrong order of events. A simple review of the Petition for Rulemaking submitted by CPBI on January 9, 2004 shows that CPBI indicated its pending applications to exchange the DTV channels of WEDH and WEDN. CPBI reiterated the pendency of the channel exchange applications in its supporting comments of July 6, 2004 (footnote, page 2).

See "Response to 'Supplement to Objection' and 'Supplement to Informal Objection' filed October 17, 2005 by CPBI, and efforts recited at footnotes 11 and 12.

⁶ See Second Periodic Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television, 19 FCC Rcd 18,279, at para. 45 (2004) ("Second Periodic Review Order").

Obviously, the Norwich proposal to utilize Channel *9 depends on the compliance with FCC interference rules for DTV. The proposal was found acceptable by the Video Division in the Notice of Proposed Rulemaking in the docket (DA04-1318, para. 3), and whether it is *9 substituted for *45 or *9 substituted for *32 does not matter – the outcome is a superior use of spectrum by CPTV by deploying Channel *45 at Hartford for Station WEDH and Channel *9 at Norwich for Station WEDN.

ABC Has Presented, and Entravision Has Relied Upon, Incorrect Engineering in its Three Presentations Regarding Station WUVN

ABC has argued that the use of DTV *45 by Station WEDH, Hartford would cause prohibited interference to Station WUVN(TV), licensed to Entravision. The amount of interference has changed from 2.8% ("Objection to Digital Television Channel Allotment Exchange" filed by ABC on January 15, 2004); to 2.7% ("Supplement to Objection", filed by ABC on September 2, 2005); to 8.91% ("Ex parte Submission" on behalf of ABC of June 12, 2006). Entravision, by counsel, each time filed its own objections, without submitting any independent engineering analysis, but only relying on ABC's submissions. ("Informal Objection" of February 5, 2004; "Supplement to Informal Objection" of September 23, 2005; and "Ex Parte Submission" of July 5, 2006).

At the meeting, it seemed clear to CPBI representatives that Media Bureau technical staff understood the errors in ABC's submissions. CPBI asked its consulting engineer to prepare the attached Engineering Statement in the event there is still any doubt that ABC has been submitting incorrect information in its submissions with regard to Station WUVN. Although denied by ABC, the facts are that its studies in each case double-count the predicted interference to Station WUVN-DT. The attached Engineering Statement demonstrates that ABC has incorrectly determined that there is increased interference, and the Bureau should reject ABC's efforts to obfuscate the actual facts of the situation through its repetitive filing of incorrect information.

Conclusion: CPBI Requires Immediate Relief and its Digital Channel Exchange Applications Should Be Granted.

As argued by CPBI in the meeting arranged by FCC staff, CPBI needs immediate relief. It has to make final arrangements for construction of both its Hartford DTV and relocated analog channels. The so-called "compromise" solution presented by ABC (Ex Parte Submission of June 12, p. 5) is no compromise at all...which explains why CPBI has not been approached in any way by ABC prior to its latest volley. Notwithstanding promises made at the ex parte meeting to explore the engineering basis of ABC's objection with CPBI's consulting engineer, nothing was done; instead, ABC has simply manufactured yet more faulty engineering, claiming yet more interference to Station WUVN, and filed its further unauthorized pleading.

CPBI stresses that its digital channel exchange proposal was filed in compliance with all FCC rules. It deserves to have those applications granted.

Respectfully submitted,

SCHWARTZ, WOODS & MILLER

SCS/mkm

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EXCERPT FROM

"TECHNICAL EXHIBIT AMENDMENT
of
APPLICATION FOR CONSTRUCTION PERMIT
for
TELEVISION STATION WEDH-DT
HARTFORD, CONNECTICUT"
dated
March 9, 2004

submitted with FCC File No. BPEDT-19990113KG amendment of March 10, 2004.

TECHNICAL EXHIBIT AMENDMENT OF APPLICATION FOR CONSTRUCTION PERMIT TELEVISION STATION WEDH-DT HARTFORD, CONNECTICUT

March 9, 2004

CHANNEL 45 465 KW (MAX-DA) 505 M

TECHNICAL EXHIBIT AMENDMENT OF APPLICATION FOR CONSTRUCTION PERMIT TELEVISION STATION WEDH-DT HARTFORD, CONNECTICUT CHANNEL 45 465 KW (MAX-DA) 505 M

Summary of Domestic Allocation Analysis

			Stations Potentially	Affected by Propo	sed Station		-
Facility Number	Channel	Call	City State	Distance (km)	Status	Application Prefix	Application Reference Number
1	30	WVIT	NEW BRITAIN CT	0.3	LIC	BLCT	19791113LC
2	43	WSAH	BRIDGEPORT CT	44.6	LIC	BLCT	19871009KE
3	44	WGBX-TV	BOSTON MA	148	LIC	BLET	20010103ABV
4	44	WNYW-DT	NEW YORK NY	148	PLN	DTVPLN	DT∨P1278
5	44	WNYW	NEW YORK NY	143.4	APP	ВМРСТТ	19990402KI
6	45	WMEA-DT	BIDDEFORD ME	252.7	PLN	DTVPLN	DTVP1302
7	45	WABC-DT	NEW YORK NY	148	PLN	DTVPLN	DTVP1309
8	45	WROC-DT	ROCHESTER NY	421	PLN	DTVPLN	DTVP1310
9	45	WEWB-TV	SCHENECTADY NY	141.1	СР	BPCT	20020213AAL

			Stations Potentially	Affected by Propo	sed Station		
Facility Number	Channel	Call	City State	Distance (km)	Status	Application Prefix	Application Reference Number
10	45	WEWB-TV	SCHENECTADY NY	141.2	LIC	BLCT	19850114KJ
11	45	WOLFTV	HAZLETON PA	259.5	LIC	BPRM	20000413AAD
12	45	WOLF-TV	HAZLETON PA	259.5	СР	BPCDT	19980825KI
13	46	WHCT-DT	HARTFORD CT	8.4	PLN	DTVPLN	DTVP1321
14	46	WWDP	NORWELL MA	151.1	LIC	BLCT	19970116KE
15	48	WYDN	WORCESTER MA	102.1	LIC	BLET	20001226AAM
16	49	WEDW	BRIDGEPORT CT	55.6	LIC	BLET	19870908KE
17	53	WEDN	NORWICH CT	58.9	СР	BPET	20011003ABH
18	53	WEDN	NORWICH CT	58.9	LIC	BLET	19860124KI

- "		Summary	of Interference Ar	alysis for Worst-Cas	e Scenarios		
Facility Number	Interference Population Before Analysis	Interference Population After Analysis	Baseline Population	Net Change in Interference	Percent of Baseline	Permissible Percent of Baseline	Result
1					0.000		pass
2	336538	338005	3020630	1467	0.049	0.05	pass
3	468427	468427	5937857	0	0.000	-	pass

Facility Number	Interference Population Before Analysis	Interference Population After Analysis	Baseline Population	Net Change in Interference	Percent of Baseline	Permissible Percent of Baseline	Result
4	520602	520602	18013319	0	0.000		pass
5	616808	616808	18013319	0	0.000		pass
6	29447	30542	647970	1095	0.169	2.0	pass
7	178527	361293	17865809	182766	1.023	2.0	pass
8			<u></u>		0.000		pass
9	3415	11566	1323548	8151	0.616	2.0	pass
10	2843	14607	1255921	11764	0.937	2.0	pass
11	400404	400404	2769938	0	0.000	2.0	pass
12					0.000		pass
13	268612	267525	3262860	-1087	-0.644	2.0	pass
14					0.000		pass
15					0.000		pass
16	268232	268821	3831205	589	0.015		pass
17	96645	96645	1465797	0	0.000	2.0	pass
18	164248	164248	1577540	0	0.000	2.0	pass

Note: A grid cell resolution of 0.75 km, with a terrain sample of 0.5 km, was employed in the OET-69 analysis.

This Engineering Statement was prepared on behalf Connecticut Public Broadcasting, Inc. ("CPBI"), in support of an *Ex Parte* Submission in response to the same filed by American Broadcasting Companies, Inc. ("ABC") and Entravision Holdings, LLC to the CPBI application for WEDH-DT, Channel *45, at Hartford, Connecticut (FCC File No. BPEDT-19990113KG) and related Petition for Rule Making for Channel *9 at Norwich, Connecticut. It is demonstrated herein that the WEDH-DT proposal fully meets the FCC 2% and 10% *de minimis* criteria with respect to all relevant allotments and assignments. Furthermore, ABC's claims that the WEDH-DT application will result in new interference to WUVN-DT in excess of the FCC 2%/10% criteria is wrong because it based on incorrect calculations which have again "double-counted" predicted interference WUVN-DT.

Interference Analysis for WEDH-DT Proposal

An interference analysis was prepared for the WEDH-DT proposal, as amended, based on the FCC Office of Engineering and Technology Bulletin No. 69 ("OET-69"). As described in the WEDH-DT application, the analysis was based on a cell size of 0.75 km and a terrain increment of 0.5 km. The WEDH-DT proposal passes every station interference analysis and <u>fully meets</u> the FCC *de minimis* criteria with respect to <u>all</u> stations including WABC-DT and WUVN-DT.* An excerpt of the output with respect to the WUVN-DT facility, as generated by the FCC OET-69 analysis software, based on the current FCC engineering database is attached hereto as Figure 1. As indicated on the last page of Figure 1, the worst-case new interference from the proposed WEDH-DT facility to WUVN-DT is -0.0333%. Therefore, the proposal passes the 2%/10% criteria with respect to WUVN-DT.

^{*} WUVN-DT is referenced by its original call sign when the FCC table of allotments was developed: WHCT-DT.

Flaw in ABC OET-69 Calculations

To further illustrate the point, an excerpt of the OET-69 analysis prepared in the <u>incorrect</u> manner is attached hereto at Figure 2. This incorrect analysis includes a NORWICH CT (BLEDT-20030425AAL) record in both the before and after studies. This record must be omitted from the interference analysis to produce a correct result. This is done at the beginning of the program input when it asks for records that should be ignored in the analysis.

But when this record is improperly included in the interference analysis, the program incorrectly determines that the WEDH-DT proposal fails the 2%/10% criteria with a worst-case new interference of 2.6021%. This incorrect result is illustrated at the bottom of Figure 2.

In sum, it appears that ABC is relying on an incorrect interference analysis to conclude that the WEDH-DT proposal fails the 2%/10% criteria; when, in fact, the WEDH-DT proposal fully passes the FCC 2%/10% *de minimis* criteria with respect to all relevant stations.

This statement was prepared by me or under my direction and it is true and correct to the best of my knowledge and belief.

Louis Robert du Treil, Jr., P.E.

Jon har fel

du Treil, Lundin & Rackley, Inc. 201 Fletcher Ave. Sarasota, Florida 34237

July 14, 2006

Correct FCC OET-69 Analysis Output for WEDH-DT with Respect to WUVN-DT

1990 Census data selected
TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 07-11-2006 Time: 11:33:27

Record Selected for Analysis

WEDHDT USERRECORD-01 NORWICH CT US Channel 45 ERP 465. kW HAAT 505. m RCAMSL 00604 m

Latitude 041-42-13 Longitude 0072-49-57

Status APP Zone 1 Border

Dir Antenna Make CDB Model 00000000065933 Beam tilt N Ref Azimuth 0.

Last update Cutoff date Docket

Comments Applicant

Company of the contract of the

Cell Size for Service Analysis 0.8 km/side

Distance Increments for Longley-Rice Analysis 0.50 km

Facility meets maximum height/power limits

Azimuth	ERP	HAAT	41.0 dBu F(50,90)
(Deg)	(kW)	(m)	(km)
0.0	407.385	539.8	108.8
45.0	376.232	545.6	108.5
90.0	431.227	566.3	111.0
135.0	374.143	563.0	109.5
180.0	42.410	462.6	84.8
225.0	26.450	464.1	81.7
270.0	88.801	448.1	89.1
315.0	431.674	452.6	102.4

Evaluation toward Class A Stations

No Spacing violations or contour overlap to Class A stations

Class A Evaluation Complete

Proposed facility OK to FCC Monitoring Stations

Correct FCC OET-69 Analysis Output for WEDH-DT with Respect to WUVN-DT

Proposed facility OK toward West Virginia quite zone

Proposed facility OK toward Table Mountian

Proposed facility is within the Canadian coordination distance Distance to border = 368.5km

Proposed facility is beyond the Mexican coordination distance

Proposed station is OK toward AM broadcast stations

Start of Interference Analysis

Proposed Station

ARN Channel

Call City/State
WEDHDT NORWICH CT 4.5 USERRECORD01

Stations Potentially Affected by Proposed Station

Chan	Call	City/State	Dist(km)	Status	Application	on Ref. No.
30	WVIT	NEW BRITAIN CT	0.3	LIC	BLCT	-19791113LC
43	WSAH	BRIDGEPORT CT	44.6	LIC	BLCT	-19871009KE
4.3	WSAH	BRIDGEPORT CT	44.6	APP	BPCT	-20060222AAG
44	WGBX-TV	BOSTON MA	148.0	LIC	BLET	-20010103ABV
44	MNAM-DJ.	NEW YORK NY	148.0	PLN	DTVPLN	-DTVP1278
44	WYYW	NEW YORK NY	143.4	CP MOD	BMPCDT	-19990402KI
45	WMEA-DT	BIDDEFORD ME	252.7	PLN	DTVPLN	-DTVP1302
45	WABC-DT	NEW YORK NY	148.0	PLN	DTVPLN	-DTVP1309
45	WROC-DT	ROCHESTER NY	421.0	PLN	DTVPLN	-DTVP1310
45	WCWN	SCHENECTADY NY	141.1	LIC	BLCT	-20040330AAX
45	WOJFTTV	HAZLETON PA	259.5	LIC	BLCDT	-20050906ACK
45	WOLFTV	HAZLETON PA	259.5	LIC	BPRM	-20000413AAD
46	WHCT-DT	HARTFORD CT	8.4	PLN	DTVPLN	-DTVP1321
46	WWDP	NORWELL MA	151.1	LIC	BLCT	-19970116KE
48	WYDN	WORCESTER MA	102.1	LIC	BLET	-20001226AAM
49	WEDW	BRIDGEPORT CT	55.6	LIC	BLET	-19870908KE
53	WEDN	NORWICH CT	58.9	LIC	BLET	-20060106ABO

Analysis of Interference to Affected Station 13

DTV Baseline Analysis
Channel Call City/State Application Ref. No.
DTVPLN -DTVP13 Channel Call City/State
46 WHCT-DT HARTFORD CT DTVPLN -DTVP1321

Stations Potentially Affecting This Station

Chan Call City/State Dist(km) Status Application Ref. No.

Correct FCC OET-69 Analysis Output for WEDH-DT with Respect to WUVN-DT

WEDN-DT	NORWICH CT	59.8	PLN	DTVPLN	-DTVP1291
WABC-DT	NEW YORK NY	155.7	PLN	DTVPLN	-DTVP1309
WMHQ	SCHENECTADY NY	137.4	PLN	DTVPLN	-NPLN1687
WHRC	NORWELL MA	146.8	PLN	DTVPLN	-NPLN1703
WBFF-DT	BALTIMORE MD	423.1	PLN	DTVPLN	-DTVP1329
WMTW-DT	POLAND SPRING ME	302.9	PLN	DTVPLN	-DTVP1330
WSKGTV	BINGHAMTON NY	261.8	PLN	DTVPLN	-NPLN1705
WFMZ-DT	ALLENTOWN PA	258.6	PLN	DTVPLN	-DTVP1339
WYDN-DT	WORCESTER MA	62.8	PLN	DTVPLN	-DTVP1362
WNJU	LINDEN NJ	155.7	PLN	DTVPLN	-NPLN1721
ults for: 4	6A CT HARTFORD	DTVPLN	D'	rVP1321	PLN
HAAT 299.0	m, ATV ERP 220.0 l	<₩			
		POPULATION	AREA	(sq km)	
within Nois	e Limited Contour	3789037	2130	0.00	
not affecte	d by terrain losses	3598762	195	19.4	
lost to NTS	CIX	63789	3.	72.8	
	WABC-DT WMHQ WHRC WBFF-DT WMTW-DT WSKGTV WFMZ-DT WYDN-DT WNJU WIts for: 4 HAAT 299.0	WABC-DT NEW YORK NY WMHQ SCHENECTADY NY WHRC NORWELL MA WBFF-DT BALTIMORE MD WMTW-DT POLAND SPRING ME WSKGTV BINGHAMTON NY WFMZ-DT ALLENTOWN PA WYDN-DT WORCESTER MA WNJU LINDEN NJ WILLS FOR: 46A CT HARTFORD HAAT 299.0 m, ATV ERP 220.0 l	WABC-DT NEW YORK NY 155.7 WMHQ SCHENECTADY NY 137.4 WHRC NORWELL MA 146.8 WBFF-DT BALTIMORE MD 423.1 WMTW-DT POLAND SPRING ME 302.9 WSKGTV BINGHAMTON NY 261.8 WFMZ-DT ALLENTOWN PA 258.6 WYDN-DT WORCESTER MA 62.8 WNJU LINDEN NJ 155.7 Aults for: 46A CT HARTFORD DTVPLN HAAT 299.0 m, ATV ERP 220.0 kW POPULATION within Noise Limited Contour 3789037 not affected by terrain losses 3598762	WABC-DT NEW YORK NY 155.7 PLN WMHQ SCHENECTADY NY 137.4 PLN WHRC NORWELL MA 146.8 PLN WBFF-DT BALTIMORE MD 423.1 PLN WMTW-DT POLAND SPRING ME 302.9 PLN WSKGTV BINGHAMTON NY 261.8 PLN WFMZ-DT ALLENTOWN PA 258.6 PLN WYDN-DT WORCESTER MA 62.8 PLN WNJU LINDEN NJ 155.7 PLN WILLS for: 46A CT HARTFORD DTVPLN HAAT 299.0 m, ATV ERP 220.0 kW POPULATION AREA within Noise Limited Contour 3789037 2130 not affected by terrain losses 3598762 1956	WABC-DT NEW YORK NY 155.7 PLN DTVPLN WMHQ SCHENECTADY NY 137.4 PLN DTVPLN WHRC NORWELL MA 146.8 PLN DTVPLN WBFF-DT BALTIMORE MD 423.1 PLN DTVPLN WMTW-DT POLAND SPRING ME 302.9 PLN DTVPLN WSKGTV BINGHAMTON NY 261.8 PLN DTVPLN WFMZ-DT ALLENTOWN PA 258.6 PLN DTVPLN WYDN-DT WORCESTER MA 62.8 PLN DTVPLN WNJU LINDEN NJ 155.7 PLN DTVPLN WNJU LINDEN NJ 155.7 PLN DTVPLN WUlts for: 46A CT HARTFORD DTVPLN DTVPLN DTVPLN WITH AMAT 299.0 m, ATV ERP 220.0 kW POPULATION AREA (sq km) within Noise Limited Contour 3789037 21300.0 not affected by terrain losses 3598762 19549.4

 10st to NISC IX
 272113
 1625.6

 10st to additional IX by ATV
 272113
 1625.6

 10st to ATV IX only
 312041
 1905.4

 10st to all IX
 335902
 1998.4

NTSC Baseline Analysis
Channel Call City/State Application Ref. No.
18 WHCTTV HARTFORD CT DTVPLN -NPLN103 DTVPLN -NPLN]012

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	on Ref. No.
15	WNYT-DT	ALBANY NY	131.3	PLN	DTVPLN	-DTVP0183
17	THMW	SCHENECTADY NY	137.7	PLN	DTVPLN	-NPLN0998
17	WOST-DT	BLOCK ISLAND RI	90.0	PLN	DTVPLN	-DTVP0279
18	WMFP-DT	LAWRENCE MA	157.5	PLN	DTVPLN	-DTVP0307
18	WNJB-DT	NEW BRUNSWICK NJ	191.6	PLN	DTVPLN	-DTVP0317
18	WETMTV	ELMIRA NY	338.5	PLN	DTVPLN	-NPLN1026
18	WNPITV	NORWOOD NY	345.0	PLN	DTVPLN	-NPLN1027
18	WVTB-DT	ST. JOHNSBURY VT	319.4	PLN	DTVPLN	-DTVP0332
19	WCDCTV	ADAMS MA	100.5	PLN	DTVPLN	-NPLN1045
19	WGBH-DT	BOSTON MA	142.]	PLN	DTVPLN	-DTVP0356
20	WTXX	WATERBURY CT	33.8	PLN	DTVPLN	-NPLN1070
21	WLIW	GARDEN CITY NY	122.4	PLN	DTVPLN	-NPLN1120
21	WRNN-DT	KINGSTON NY	112.8	PLN	DTVPLN	-DTVP0450
21	WSBE-DT	PROVIDENCE RI	110.1	PLN	DTVPLN	-DTVP0455
22	WWLP	SPRINGFIELD MA	35.4	PLN	DTVPLN	-NPLN1144
22	WL'IM-DT	GARDEN CITY NY	122.4	PLN	DTVPLN	-DTVP0499
25	WFXT	BOSTON MA	143.2	PLN	DTVPLN	-NPLN1247
25	WNYETV	NEW YORK NY	151.1	PLN	DTVPLN	-NPLN1254
26	WTWS	NEW LONDON CT	63.9	PLN	DTVPLN	-NPLN1268
26	WTEN-DT	ALBANY NY	137.5	PLN	DTVPLN	-DTVP0647
32	WEDH-DT	HARTFORD CT	0.4	PLN	DTVPLN	-DTVP0857
33	WFSB-DT	HARTFORD CT	0.4	PLN	DTVPLN	-DTVP0894

Results for: 18N CT HARTFORD DTVPLN POPULATION AREA (sq km) DTVPLN NPLN1012 PLN

Correct FCC OET-69 Analy	ysis Output for WI	EDH-DT wit	h Respect	to WUVN-DT
within Noise Limited Cont not affected by terrain I lost to NTSC IX lost to additional IX by lost to all IX	losses 3481464 344919	21296. 19029. 1357. 993. 2350.	.6 .0 .8	
Analysis of current record				
	City/State	Application	on Ref. No	
	ORD CT	DTVPLN		
Stations Potentially A	ffecting This Sta	tion		
Chan Call City/State	Diet (k	m) Status	Application	on Ref. No.
45 WEDN-DT NORWICH CT		.8 PLN	DTVPLN	-DTVP1291
45 WABC-DT NEW YORK NY		.7 PLN	DTVPLN	-DTVP1309
45 WCWN SCHENECTADY I		.3 LIC	BLCT	-20040330AAX
46 WWDP NORWELL MA	146	.8 LIC	BLCT	-19970116KE
46 WBFF BALTIMORE MD	423	.1 CP	BPCDT	-19980803KR
46 WBFF-DT BALTIMORE MD	423	.1 PLN	DTVPLN	-DTVP1329
46 WMTW-TV POLAND SPRING		.9 LIC	BLCDT	-20050607ADJ
46 WMTW-DT POLAND SPRING			DTVPLN	-DTVP1330
46 WSKG-TV BINGHAMTON N			BLET	-20040109ACN
46 WFMZ-DT ALLENTOWN PA 46 WFMZ-TV ALLENTOWN PA			DTVPLN BMPCDT	-DTVP1339 -20041029AHC
46 WFMZ-TV ALLENTOWN PA 47 WYDN WORCESTER MA		1.5 CP MOD	BLEDT	-20041029ARC
47 WYDN-DT WORCESTER MA		.8 PLN	DTVPLN	-DTVP1362
47 WNJU LINDEN NJ		.7 CP	BPCT	-19991028AAN
45 WEDHDT NORWICH CT	8	.4 APP	USERRECOR	D-01
Total scenarios = 8				
Result key: 1 Scenario 1 Affected Before Analysis	station 13	3		
Results for: 46A CT HARTFOR HAAT 299.0 m, ATV ERP		PLN DTV	P1321	PLN
	POPULATION	AREA (s	q km)	
within Noise Limited Con				
not affected by terrain		19549		
lost to NTSC IX	61816	367		
lost to additional IX by		902		
lost to ATV 1X only lost to all IX	238909 268612	1107 1270		
jost to all tx	7.00012	1270		
Potential Interfering Stat	ions Included in	above Scen	ario 1	
46n ma norwell	BLCT 199701	116KE LIC		
46N NY BINGHAMTON		LO9ACN LIC		
47N NJ LINDEN	BPCT 199910	028AAN CP		
45A NY NEW YORK	DTVPLN DTVP13			
46A ME POLAND SPRING	BLCDT 200506	507ADJ LIC		

Correct FCC OE1-69 Ana	aiysis Outp	ut for WEDH-L	i with Resp	ect to w
46A PA ALLENTOWN	DTVPLN	DTVP1339	PLN	
47A MA WORCESTER		20050505ABL		
45A CT NORWICH		DTVP1291		
1011 01 11011111011		51111151	2 2224	
After Analysis				
Results for: 46A CT HARTFO			DTVP1321	PLN
HAAT 299.0 m, ATV ERP				
	PC	OPULATION ARE	•	
within Noise Limited Co	ntour		21300.0	
not affected by terrain	losses	3598762	.9549.4	
lost to NTSC IX lost to additional IX b	NTX7		367.7 1254.0	
lost to AMW IV only	y AIV	236265	1446.0	
lost to ATV IX only lost to all IX		267525	1621.7	
1030 to all 1A		207323	1021.7	
Potential Interfering Sta	tions Inc	luded in above	Scenario	1
46N MA NORWELL	BI.CT	19970116KE	LIC	
46N NY BINGHAMTON		20040109ACN		
47N NJ LINDEN	□ DCT	10001020XXX	CD	
45A NY NEW YORK	DTVPLN	DTVP1309	PLN	
46A ME POLAND SPRING				
46A PA ALLENTOWN		DTVP1339		
47A MA WORCESTER	BLEDT	20050505ABL	LIC	
45A CT NORWICH	USERREC	ORDO1	APP	
Percent new IX = -0.0333 Result key: 2	18			
Scenario 2 Affecte	d station	13		
Before Analysis	a ocacion	10		
Results for: 46A CT HARTFO	ממו	DTWDI M	DTVP1321	PLN
HAAT 299.0 m, ATV ERP			DIVELDE	£ TIM
HAMI 299.0 M, MIV BRI		OPULATION ARE	CA (sa km)	
within Noise Limited Co			21300.0	
not affected by terrain	losses	3598762 1	19549.4	
lost to NTSC IX		61816	367.7	
lost to additional TX b	y ATV	270745	1609.8	
lost to ATV IX only		310426	1887.4	
lost to all IX		332561	1977.5	
Potential Interfering Sta	ations Inc	luded in above	Scenario	2
46n MA NORWELL	BLCT	19970116KE	LIC	
46N NY BINGHAMTON	BLET	20040109ACN		
47N NJ LINDEN	BPCT	19991028AAN		
45A NY NEW YORK	DTVPLN	DTVP1309	PLN	
46A ME POLAND SPRING	BLCDT	20050607ADJ		
46A PA ALLENTOWN	DTVPLN	DTVP1339	PLN	
47A MA WORCESTER	DTVPLN	DTVP1362	PLN	
45A CT NORWICH	DTVPLN	DTVP1291	PLN	

Correct FCC OET-69 Analysis Output for WEDH-DT with Respect to WUVN-DT

After Analysis

Results for: 46A CT HARTFOR HAAT 299.0 m, ATV ERP			N DTVP1321	PLN
111 250,0 m, 111 v BM			AREA (sq km)	
within Maiga Timited Con				
within Noise Limited Con not affected by terrain	leggen	2500742	19549.4	
local to MMCC IV	rosses	61016	19049.4	
lost to NTSC IX lost to additional IX by	7.0017	01010	307.7	
lost to additional IX by	ATV	200004	1928.5	
lost to ATV IX only		306910	2192.6	
lost to all IX		306910 330670	2296.2	
Potential Interfering Stat	ions Inc			2
46N MA NORWELL	BLCT	19970116	KE LIC	
46N NY BINGHAMTON	BLET	200401092	ACN LIC	
47N NJ LINDEN	BPCT	19991028	AAN CP	
45A NY NEW YORK	DTVPLN	DTVP1309	PLN	
46A ME POLAND SPRING	BLCDT	DTVP1309 20050607 <i>1</i>	ADJ LIC	
46A PA ALLENTOWN	DTVPLN	DTVP1339	PLN	
47A MA WORCESTER	DTVPLN	DTVP1339 DTVP1362	PLN	
	USERREC		APP	
Percent new IX0.0580%				
Result key: 3				
Result key: 3 Scenario 3 Affected	station	13		
Before Analysis				
in.				
Results for: 46A CT HARTFOR	.D	DTVPLI	N DTVP1321	PIN
			N DTVP1321	PIN
HAAT 299.0 m, ATV ERP	220.0 kW	OPULATION	N DTVP1321 AREA (sq km)	PLN
HAAT 299.0 m, ATV ERP	220.0 kW	OPULATION		PIN
HAAT 299.0 m, ATV ERP within Noise Limited Con	220.0 kW P itour	OPULATION 3789037	AREA (sq km)	PI,N
HAAT 299.0 m, ATV ERP within Noise Limited Connot affected by terrain	220.0 kW P tour losses	OPULATION 3789037 3598762	AREA (sq km) 21300.0 19549.4	PI,N
HAAT 299.0 m, ATV ERP within Noise Limited Connot affected by terrain	220.0 kW P tour losses	OPULATION 3789037 3598762	AREA (sq km) 21300.0 19549.4	PLN
HAAT 299.0 m, ATV ERP within Noise Limited Connot affected by terrain	220.0 kW P tour losses	OPULATION 3789037 3598762	AREA (sq km) 21300.0 19549.4	PLN
HAAT 299.0 m, ATV ERP within Noise Limited Con	220.0 kW P tour losses	OPULATION 3789037 3598762	AREA (sq km) 21300.0 19549.4	PLN
HAAT 299.0 m, ATV ERP within Noise Limited Con not affected by terrain lost to NTSC IX lost to additional IX by lost to ATV IX only	220.0 kW P tour losses	OPULATION 3789037 3598762 61816 206796 240258	AREA (sq km) 21300.0 19549.4 367.7 902.6 1110.4	PLN
HAAT 299.0 m, ATV ERP within Noise Limited Con not affected by terrain lost to NTSC IX lost to additional IX by lost to ATV IX only	220.0 kW P stour losses ATV	OPULATION 3789037 3598762 61816 206796 240258 268612	AREA (sq km) 21300.0 19549.4 367.7 902.6 1110.4 1270.3	
HAAT 299.0 m, ATV ERP within Noise Limited Connot affected by terrain lost to NTSC IX lost to additional IX by lost to ATV IX only lost to all IX	220.0 kW P atour losses ATV Tions Inc	OPULATION 3789037 3598762 61816 206796 240258 268612 luded in about	AREA (sq km) 21300.0 19549.4 367.7 902.6 1110.4 1270.3	
HAAT 299.0 m, ATV ERP within Noise Limited Con not affected by terrain lost to NTSC IX lost to additional IX by lost to ATV IX only lost to all IX Potential Interfering Stat	220.0 kW P atour losses ATV Tions Inc	OPULATION 3789037 3598762 61816 206796 240258 268612 luded in about	AREA (sq km) 21300.0 19549.4 367.7 902.6 1110.4 1270.3 ove Scenario	
HAAT 299.0 m, ATV ERP within Noise Limited Connot affected by terrain lost to NTSC IX lost to additional IX by lost to ATV IX only lost to all IX Potential Interfering Stat 46N MA NORWELL 46N NY BINGHAMTON	220.0 kW P atour losses ATV cions Inc BLCT BLET BPCT	OPULATION 3789037 3598762 61816 206796 240258 268612 luded in ab 19970116 20040109 19991028	AREA (sq km) 21300.0 19549.4 367.7 902.6 1110.4 1270.3 ove Scenario KE LIC ACN LIC AAN CP	
HAAT 299.0 m, ATV ERP within Noise Limited Con not affected by terrain lost to NTSC IX lost to additional IX by lost to ATV IX only lost to all IX Potential Interfering Stat 46N MA NORWELL 46N NY BINGHAMTON 47N NJ LINDEN 45A NY NEW YORK	220.0 kW P atour losses ATV cions Inc BLCT BLET BPCT	OPULATION 3789037 3598762 61816 206796 240258 268612 luded in ab 19970116 20040109 19991028	AREA (sq km) 21300.0 19549.4 367.7 902.6 1110.4 1270.3 ove Scenario KE LIC ACN LIC AAN CP	
HAAT 299.0 m, ATV ERP within Noise Limited Con not affected by terrain lost to NTSC IX lost to additional IX by lost to ATV IX only lost to all IX Potential Interfering Stat 46N MA NORWELL 46N NY BINGHAMTON 47N NJ LINDEN 45A NY NEW YORK	220.0 kw P atour losses ATV cions Inc BLCT BLET BPCT DTVPLN	OPULATION 3789037 3598762 61816 206796 240258 268612 luded in ab 19970116 20040109 19991028 DTVP1309	AREA (sq km) 21300.0 19549.4 367.7 902.6 1110.4 1270.3 DVE SCENARIO KE LIC ACN LIC AAN CP PLN	
HAAT 299.0 m, ATV ERP within Noise Limited Cornot affected by terrain lost to NTSC IX lost to additional IX by lost to ATV IX only lost to all IX Potential Interfering Stat 46N MA NORWELL 46N NY BINGHAMTON 47N NJ LINDEN 45A NY NEW YORK 46A ME POLAND SPRING	220.0 kW Patour losses ATV Lions Inc BLCT BLCT BPCT DTVPLN BLCDT	OPULATION 3789037 3598762 61816 206796 240258 268612 luded in ab 19970116 20040109 19991028 DTVP1309 20050607	AREA (sq km) 21300.0 19549.4 367.7 902.6 1110.4 1270.3 ove Scenario KE LIC ACN LIC AAN CP PLN ADJ LIC	
HAAT 299.0 m, ATV ERP within Noise Limited Cornot affected by terrain lost to NTSC IX lost to additional IX by lost to ATV IX only lost to all IX Potential Interfering Stat 46N MA NORWELL 46N NY BINGHAMTON 47N NJ LINDEN 45A NY NEW YORK 46A ME POLAND SPRING 46A PA ALLENTOWN	220.0 kW P atour losses ATV cions Inc BLCT BLCT BLFT DTVPLN BLCDT BMPCDT BMPCDT	OPULATION 3789037 3598762 61816 206796 240258 268612 luded in ab 19970116 20040109 19991028 DTVP1309 20050607 20041029 20050505	AREA (sq km) 21300.0 19549.4 367.7 902.6 1110.4 1270.3 ove Scenario KE LIC ACN LIC AAN CP PLN ADJ LIC AHC CP ARL LIC	
HAAT 299.0 m, ATV ERP within Noise Limited Cornot affected by terrain lost to NTSC IX lost to additional IX by lost to ATV IX only lost to all IX Potential Interfering State 46N MA NORWELL 46N NY BINGHAMTON 47N NJ LINDEN 45A NY NEW YORK 46A ME POLAND SPRING 46A PA ALLENTOWN 47A MA WORCESTER	220.0 kW P atour losses ATV cions Inc BLCT BLCT BLFT DTVPLN BLCDT BMPCDT BMPCDT	OPULATION 3789037 3598762 61816 206796 240258 268612 luded in ab 19970116 20040109 19991028 DTVP1309 20050607 20041029 20050505	AREA (sq km) 21300.0 19549.4 367.7 902.6 1110.4 1270.3 ove Scenario KE LIC ACN LIC AAN CP PLN ADJ LIC AHC CP ARL LIC	
HAAT 299.0 m, ATV ERP within Noise Limited Cornot affected by terrain lost to NTSC IX lost to additional IX by lost to ATV IX only lost to all IX Potential Interfering Stat 46N MA NORWELL 46N NY BINGHAMTON 47N NJ LINDEN 45A NY NEW YORK 46A ME POLAND SPRING 46A PA ALLENTOWN	220.0 kW P atour losses ATV cions Inc BLCT BLCT BLFT DTVPLN BLCDT BMPCDT BMPCDT	OPULATION 3789037 3598762 61816 206796 240258 268612 luded in about 19970116 20040109, 19991028, DTVP1309 20050607, 20041029	AREA (sq km) 21300.0 19549.4 367.7 902.6 1110.4 1270.3 ove Scenario KE LIC ACN LIC AAN CP PLN ADJ LIC AHC CP ARL LIC	

Results for: 46A CT HARTFOR	RD	DTVPLN	DTVP1321	PLN
HAAT 299.0 m, ATV ERP	220.0 kW			
	P	OPULATION ARE	A (sq km)	
within Noise Limited Cor	ntour	3789037 2	1300.0	
not affected by terrain			9549.4	
lost to NTSC IX		61816	367.7	
lost to NTSC IX lost to additional IX by	v ma v	205709	1254.0	
		237614		
lost to all IX			1621.7	
, , , , , , , , , , , , , , , , , , , ,				
Potential Interfering Stat	lions Inc	luded in above	Scenario	3
46N MA NORWELL	BLCT	19970116KE	LIC	
46N NY BINGHAMTON	BLET	20040109ACN	LIC	
47N NJ LINDEN	BPCT'			
	DTVPLN		PLN	
46A ME POLAND SPRING	BLCDT	20050607ADJ		
		20041029AHC		
47A MA WORCESTER	BLEDT			
45A CT NORWICH	USERREC		APP	
	002111			
Percent new IX = -0.0333	ž.			
Result kov: 4				
Result key: 4 Scenario 4 Affected	d station	13		
Before Analysis	2 500	. 13		
DOLOTO INIGIANTE				
Results for: 46A CT HARTFO	RD.	DTVPLN	DTVP1321	PLN
Results for: 46A CT HARTFO			DTVP1321	PLN
Results for: 46A CT HARTFO	220.0 kW			PLN
HAAT 299.0 m, ATV ERP	220.0 kW	OPULATION ARE	EA (sq km)	PLN
HAAT 299.0 m, ATV ERP	220.0 kW P ntour	OPULATION ARE	EA (sq km) 21300.0	PLN
HAAT 299.0 m, ATV ERP within Noise Limited Co not affected by terrain	220.0 kW P ntour	OPULATION ARE 3789037 2 3598762 :	EA (sq km) 21300.0 19549.4	PLN
HAAT 299.0 m, ATV ERP within Noise Limited Co not affected by terrain lost to NTSC IX	220.0 kW P ntour losses	OPULATION ARE 3789037 2 3598762 : 61816	ZA (sq km) 21300.0 19549.4 367.7	PLN
HAAT 299.0 m, ATV ERP within Noise Limited Co not affected by terrain lost to NTSC IX lost to additional IX b	220.0 kW P ntour losses y ATV	OPULATION ARE 3789037 3 3598762 3 61816 270745	EA (sq km) 21300.0 19549.4 367.7 1609.8	PLN
HAAT 299.0 m, ATV ERP within Noise Limited Co not affected by terrain lost to NTSC IX lost to additional IX b lost to ATV IX only	220.0 kW P ntour losses y ATV	OPULATION ARE 3789037 2 3598762 3 61816 270745 311775	EA (sq km) 21300.0 19549.4 367.7 1609.8 1890.8	PLN
HAAT 299.0 m, ATV ERP within Noise Limited Co not affected by terrain lost to NTSC IX lost to additional IX b	220.0 kW P ntour losses y ATV	OPULATION ARE 3789037 3 3598762 3 61816 270745	EA (sq km) 21300.0 19549.4 367.7 1609.8	PLN
HAAT 299.0 m, ATV ERP within Noise Limited Co not affected by terrain lost to NTSC IX lost to additional IX b lost to ATV IX only	220.0 kW P ntour losses y ATV	OPULATION ARE 3789037 2 3598762 3 61816 270745 311775 332561	EA (sq km) 21300.0 19549.4 367.7 1609.8 1890.8 1977.5	PLN
within Noise Limited Co not affected by terrain lost to NTSC IX lost to additional IX b lost to ATV IX only lost to all IX	220.0 kw P ntour losses y ATV	OPULATION ARE 3789037 3598762 561816 270745 311775 332561	EA (sq km) 21300.0 19549.4 367.7 1609.8 1890.8 1977.5	
HAAT 299.0 m, ATV ERP within Noise Limited Co not affected by terrain lost to NTSC IX lost to additional IX b lost to ATV IX only lost to all IX Potential Interfering Sta	220.0 kw P ntour losses y ATV tions Inc	OPULATION ARE 3789037 3 3598762 5 61816 270745 311775 332561 Cluded in above	EA (sq km) 21300.0 19549.4 367.7 1609.8 1890.8 1977.5 Scenario	
within Noise Limited Co not affected by terrain lost to NTSC IX lost to additional IX b lost to ATV IX only lost to all IX Potential Interfering Sta 46N MA NORWELL 46N NY BINGHAMTON	220.0 kw P ntour losses y ATV tions Inc BLCT BLET	OPULATION ARE 3789037 3 3598762 5 61816 270745 311775 332561 cluded in above 19970116KE 20040109ACN	EA (sq km) 21300.0 19549.4 367.7 1609.8 1890.8 1977.5 Scenario LIC	
within Noise Limited Co not affected by terrain lost to NTSC IX lost to additional IX b lost to ATV IX only lost to all IX Potential Interfering Sta 46N MA NORWELL 46N NY BINGHAMTON 47N NJ LINDEN	220.0 kw P ntour losses y ATV tions Inc BLCT BLET BPCT	OPULATION ARE 3789037 3 3598762 5 61816 270745 311775 332561 cluded in above 19970116KE 20040109ACN 19991028AAN	ZA (sq km) 21300.0 19549.4 367.7 1609.8 1890.8 1977.5 Scenario LIC LIC CP	
within Noise Limited Co not affected by terrain lost to NTSC IX lost to additional IX b lost to ATV IX only lost to all IX Potential Interfering Sta 46N MA NORWELL 46N NY BINGHAMTON 47N NJ LINDEN 45A NY NEW YORK	220.0 kw P ntour losses y ATV tions Inc BLCT BLET BPCT DTVPLN	OPULATION ARE 3789037 3 3598762 6 61816 270745 311775 332561 cluded in above 19970116KE 20040109ACN 19991028AAN DTVP1309	ZA (sq km) 21300.0 19549.4 367.7 1609.8 1890.8 1977.5 Scenario LIC LIC CP PLN	
within Noise Limited Co not affected by terrain lost to NTSC IX lost to additional IX b lost to ATV IX only lost to all IX Potential Interfering Sta 46N MA NORWELL 46N NY BINGHAMTON 47N NJ LINDEN 45A NY NEW YORK 46A ME POLAND SPRING	220.0 kw P ntour losses y ATV tions Inc BLCT BLET BPCT DTVPLN BLCDT	OPULATION ARI 3789037 3 3598762 61816 270745 311775 332561 Pluded in above 19970116KE 20040109ACN 19991028AAN DTVP1309 20050607ADJ	EA (sq km) 21300.0 19549.4 367.7 1609.8 1890.8 1977.5 Scenario LIC LIC CP PLN LIC	
within Noise Limited Co not affected by terrain lost to NTSC IX lost to additional IX b lost to ATV IX only lost to all IX Potential Interfering Sta 46N MA NORWELL 46N NY BINGHAMTON 47N NJ LINDEN 45A NY NEW YORK 46A ME POLAND SPRING 46A FA ALLENTOWN	220.0 kw P ntour losses y ATV tions Inc BLCT BLET BPCT DTVPLN BLCDT BMPCDT	OPULATION ARE 3789037 3 3598762 61816 270745 311775 332561 cluded in above 19970116KE 20040109ACN 19991028AAN DTVP1309 20050607ADJ 20041029AHC	ZA (sq km) 21300.0 19549.4 367.7 1609.8 1890.8 1977.5 Scenario LIC LIC CP PLN LIC CP	
within Noise Limited Co not affected by terrain lost to NTSC IX lost to additional IX b lost to ATV IX only lost to all IX Potential Interfering Sta 46N MA NORWELL 46N NY BINGHAMTON 47N NJ LINDEN 45A NY NEW YORK 46A ME POLAND SPRING 46A FA ALLENTOWN 47A MA WORCESTER	220.0 kw P ntour losses y ATV tions Inc BLCT BLET BPCT DTVPLN BLCDT BMPCDT DTVPLN	OPULATION ARE 3789037 3 3598762 61816 270745 311775 332561 cluded in above 19970116KE 20040109ACN 19991028AAN DTVP1309 20050607ADJ 20041029AHC DTVP1362	ZA (sq km) 21300.0 19549.4 367.7 1609.8 1890.8 1977.5 Scenario LIC LIC CP PLN LIC CP PLN	
within Noise Limited Co not affected by terrain lost to NTSC IX lost to additional IX b lost to ATV IX only lost to all IX Potential Interfering Sta 46N MA NORWELL 46N NY BINGHAMTON 47N NJ LINDEN 45A NY NEW YORK 46A ME POLAND SPRING 46A FA ALLENTOWN	220.0 kw P ntour losses y ATV tions Inc BLCT BLET BPCT DTVPLN BLCDT BMPCDT	OPULATION ARE 3789037 3 3598762 61816 270745 311775 332561 cluded in above 19970116KE 20040109ACN 19991028AAN DTVP1309 20050607ADJ 20041029AHC	ZA (sq km) 21300.0 19549.4 367.7 1609.8 1890.8 1977.5 Scenario LIC LIC CP PLN LIC CP	
within Noise Limited Co not affected by terrain lost to NTSC IX lost to additional IX b lost to ATV IX only lost to all IX Potential Interfering Sta 46N MA NORWELL 46N NY BINGHAMTON 47N NJ LINDEN 45A NY NEW YORK 46A ME POLAND SPRING 46A FA ALLENTOWN 47A MA WORCESTER	220.0 kw P ntour losses y ATV tions Inc BLCT BLET BPCT DTVPLN BLCDT BMPCDT DTVPLN	OPULATION ARE 3789037 3 3598762 61816 270745 311775 332561 cluded in above 19970116KE 20040109ACN 19991028AAN DTVP1309 20050607ADJ 20041029AHC DTVP1362	ZA (sq km) 21300.0 19549.4 367.7 1609.8 1890.8 1977.5 Scenario LIC LIC CP PLN LIC CP PLN	
within Noise Limited Co not affected by terrain lost to NTSC IX lost to additional IX b lost to ATV 1X only lost to all IX Potential Interfering Sta 46N MA NORWELL 46N NY BINGHAMTON 47N NJ LINDEN 45A NY NEW YORK 46A ME POLAND SPRING 46A FA ALLENTOWN 47A MA WORCESTER 45A CT NORWICH	220.0 kW P ntour losses y ATV tions Inc BLCT BLET BPCT DTVPLN BLCDT BMPCDT DTVPLN DTVPLN	OPULATION ARI 3789037 3598762 51 61816 270745 311775 332561 51 cluded in above 19970116KE 20040109ACN 19991028AAN DTVP1309 20050607ADJ 20041029AHC DTVP1362 DTVP1291	ZA (sq km) 21300.0 19549.4 367.7 1609.8 1890.8 1977.5 Scenario LIC LIC CP PLN LIC CP PLN	
within Noise Limited Co not affected by terrain lost to NTSC IX lost to additional IX b lost to ATV IX only lost to all IX Potential Interfering Sta 46N MA NORWELL 46N NY BINGHAMTON 47N NJ LINDEN 45A NY NEW YORK 46A ME POLAND SPRING 46A FA ALLENTOWN 47A MA WORCESTER 45A CT NORWICH After Analysis	220.0 kW P ntour losses y ATV tions Inc BLCT BLET BPCT DTVPLN BLCDT BMPCDT DTVPLN DTVPLN	OPULATION ARI 3789037 3598762 61816 270745 311775 332561 Pluded in above 19970116KE 20040109ACN 19991028AAN DTVP1309 20050607ADJ 20041029AHC DTVP1362 DTVP1291	EA (sq km) 21300.0 19549.4 367.7 1609.8 1890.8 1977.5 Scenario LIC LIC CP PLN LIC CP PLN PLN PLN	4

Correct FCC OET-69 Analys	sis Outp	ut for WEDH-I	OF with Resp	ect to WUVN
within Noise Limited Conto	nır	3789037	21300.0	
not affected by terrain Ic				
lost to NTSC IX	70000	61816	367.7	
	ATV	268854	1928 5	
lost to additional IX by A lost to ATV IX only	•	61816 268854 308259	2196 N	
lost to all iX		330670	2296.2	
1030 00 411 17		330070	2230.2	
Potential Interfering Static	ons Incl	uded in above	Scenario	4
46N MA NORWELL E	BLCT	19970116KE	LIC	
47N NJ LINDEN E	BPCT	20040109ACN 19991028AAN	CP	
45A NY NEW YORK	OTVPLN	DTVP1309	PLN	
46A ME POLAND SPRING I 46A PA ALLENTOWN I 47A MA WORCESTER I	RMPCDT	20041029AHC	CP.	
46A PA ALLENTOWN FATA MA WORCESTER FATA OT NORMICH	TVPI.N	DTVP1362	PLN	
45A CT NORWICH	ISERRECO	BIVII302	APP	
45/1 01 1/0////0/1	JOBNING OF	71.001		
Percent new IX = -0.0580%				
Result key: 5				
Scenario 5 Affected s	station	13		
Before Analysis				
•				
Results for: 46A CT HARTFORD		DTVPLN	DTVP1321	PLN
HAAT 299.0 m, ATV ERP 23	20.0 kW			
	PC	PULATION AF	REA (sq km)	
within Noise Limited Conto	our	3789037	21300.0	
not affected by terrain lo lost to NTSC 1X	osses	3598762	19549.4	
lost to NTSC 1X		61816	367.7	
lost to additional IX by A	VTA	210451	950.5	
lost to ATV IX only		245972	1157.7	
lost to all IX		272267	1318.2	
Potential Interfering Static	ons Incl	luded in above	e Scenario	5
46N MA NORWELL	BLCT	19970116KE	LIC	
46N NY BINGHAMTON	BLET	20040109ACN	l LIC	
			I CP	
45A NY NEW YORK	DTVPLN	19991028AAN DTVP1309	PLN	
46A ME POLAND SPRING	DTVPLN	DTVP1330	PLN	
	DTVPLN	DTVP1339	PLN	
	BLEDT	20050505ABI	LIC	
	DTVPLN	DTVP1291	PLN	
After Analysis				
Results for: 46A CT HARTFORD		DTVPLN	DTVP1321	PLN
HAAT 299.0 m, ATV ERP 2				
		OPULATION A	REA (sq km)	
within Noise Limited Cont		3789037	21300.0	
not affected by terrain 1		3598762	19549.4	
lost to NTSC IX		61816	367.7	

Contest CC OB1 OF Times	, sis carpe	it for WESDIT I	or with respe	<u> </u>	
2					
lost to additional TX by lost to ATV TX only	ATV	207555	1292.3		
lost to all IX		269371	1659.9		
Potential Interfering Stati	ons Incl	uded in above	Scenario	5	
46N MA NORWELL	BI,CT	19970116KE	LIC		
46N NY BINGHAMTON	BLET	20040109ACN	LIC		
47N NJ LINDEN	BPCT	19991028AAN	CP		
45A NY NEW YORK	DTVPLN	DTVP1309	PLN		
46A ME POLAND SPRING	DTVPLN	DTVP1330	PLN		
46A PA ALLENTOWN	DTVPLN	DTVP1339	PLN		
47A MA WORCESTER	BLEDT	20050505ABL	LIC		
	USERRECO:		APP		
D					
Percent new IX = -0.0888%					
Result key: 6					
Scenario 6 Affected	station	13			
Before Analysis					
Results for: 46A CT HARTFORI)	DTVPLN	DTVP1321	PLN	
HAAT 299.0 m, ATV ERP 1					
·		PULATION AR	EA (sa km)		
within Noise Limited Cont	our	3789037	21300.0		
not affected by terrain		3598762	19549.4		
lost to NTSC IX		61816	367.7		
lost to additional IX by	VTA	272246	1626.7		
lost to ATV IX only		312041	1905.4		
lost to all IX		334062	1994.4		
Potential Interfering Stat:	ions Incl	uded in above	Scenario	6	
46N MA NORWELL	BLCT	19970116KE	LTC		
	BLET				
	BPCT	19991028AAN			
	DIVPLN	DTVP1309			
46A ME POLAND SPRING					
		DTVP1339			
	DTVPLN	DTVP1362	PLN		
45A CT NORWICH	DTVPLN	DTVP1291	PLN		
After Analysis					
Results for: 46A CT HARTFOR	٦	DTVPLN	DTVP1321	PLN	
HAAT 299.0 m, ATV ERP 3		D1 11 711	2.,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	1 111	
		PULATION AR	EA (sq km)		
within Noise Limited Con			21300.0		
not affected by terrain			19549.4		
lost to NTSC IX		61816	367.7		
lost to additional IX by	ATV	268571	1936.4		
lost to ATV IX only		304727	2187.5		
lost to all IX		330387	2304.1		

Potential Interfering State	ions Incl	luded in abov	e Scenario	6
46N MA NORWELL	BI CT	19970116KE	T I C	
46N NY BINGHAMTON	BLCT BLET	20040109AC		
		19991028AA	N CP	
46A ME POLAND SPRING	DIALPIN	DTVP1309 DTVP1330	PLN	
46A PA ALLENTOWN	DIALPN	DTVP1330	PLN	
		DTVP1362 DRD01	APP	
45A CT NORWICH	OSEKKEC	OKDOI	AFF	
Percent new IX = -0.1126%				
Result key: 7				
Scenario 7 Affected Before Analysis	station	13		
Results for: 46A CT HARTFORI HAAT 299.0 m, ATV ERP 2			DTVP1321	PLN
naar 299.0 m, arv ERP 2			DEN (ea km)	
within Noise Limited Conf	P(OPULATION A	21300.0	
not affected by terrain 1	lour	3109031	105/0.0	
1 t t NMOG TV		(1016	267 3	
lost to NTSC IX lost to additional IX by lost to ATV IX only	A 0357	61816	307.7	
lost to additional ix by	AIV	210431	950.5	
lost to ATV IX only lost to all IX		272267	1210 2	
lost to all IX		212201	1318.2	
Potential Interfering Stat:	ions Incl	luded in abov	e Scenario	7
46N MA NORWELL	BLCT	19970116KE	LTC	
4 7 4 10 T.	B. T. B. B.			
47N NJ LINDEN	BPCT	20040109AC 19991028AA	N CP	
		DTVP1309		
46A ME POLAND SPRING				
46A PA ALLENTOWN	BMPCDT	20041029AH	C CP	
47A MA WORCESTER	BLEDT	20050505AB	I. LIC	
		DTVP1291		
After Analysis	D) (1 11)	1511111111		
meer marysts				
Results for: 46A CT HARTFOR HAAT 299.0 m, ATV ERP			DTVP1321	PLN
HIGH 200.0 M, MIV ERE		OPULATION A	REA (so km)	
within Noise Limited Con		3789037	21300.0	
not affected by terrain		3598762	19549.4	
lost to NTSC IX	100000	61816	367.7	
lost to wise ix	ATV		1292.3	
lost to ATV IX only	111 V	240542	1473.0	
lost to all TX		269371	1659.9	
1000 LU all IA		207371	1000.0	
Potential Interfering Stat	ions Inc	luded in abov	re Scenario	7

46N MA NORWELL	BLCT	19970116KE	LIC	
46N NY BINGHAMTON	BLET	20040109ACN	LIC	
47N NJ LINDEN	BPCT	19991028AAN	CP	
45A NY NEW YORK	DTVPLN	DTVP1309	PLN	
46A ME POLAND SPRING				
	BMPCDT			
47A MA WORCESTER	BLEDT	20050505ABL	LIC	
45A CT NORWICH	USERREC	ORD01	APP	
Percent new IX = -0.0888%				
Result key: 8				
Scenario 8 Affected	station	13		
Before Analysis	Dudelon	13		
before Analysis				
Results for: 46A CT HARTFOR	D	DTVPLN	DTVP1321	PLN
HAAT 299.0 m, ATV ERP				
,		OPULATION ARE	EA (sq km)	
within Noise Limited Con			21300.0	
not affected by terrain		3598762 1		
lost to NTSC 1X	105505	61816	367.7	
lost to additional IX by	7 E17 I	01010	1626.7	
lost to additional IX by	ATV	212246		
lost to ATV IX only			1908.8	
lost to all IX		334062	1994.4	
Potential Interfering Stat	ions Inc	luded in above	Scenario	8
46N MA NORWELL	BLCT	19970116KE	LIC	
	BLET	20040109ACN	LIC	
47N NJ LINDEN	BPCT	19991028AAN	CP	
		DTVP1309	PLN	
	DTVPLN		PLN	
46A PA ALLENTOWN	BMPCDT	20041029AHC		
		DTVP1362		
45A CT NORWICH	DIABPN	DTVP1291	PLN	
After Analysis				
Results for: 46A CT HARTFOR	D	DTVPLN	DTVP1321	PLN
HAAT 299.0 m, ATV ERP				
·	P	OPULATION ARE	EA (sa km)	
within Noise Limited Con			21300.0	
not affected by terrain	losses		19549.4	
lost to NTSC IX		61816	367.7	
lost to additional IX by	VTA		1936.4	
lost to ATV IX only		306076	2190.9	
lost to all IX		330387	2304.1	
Potential Interfering Stat	ions Inc	luded in above	Scenario	8
4 CAL MAY MINISTRUCT	DI CM	19970116KE	1.10	
46N MA NORWELL	BLCT		LIC	
46N NY BINGHAMTON	BLET	20040109ACN		
47N NJ LINDEN	BPCT	19991028AAN	CP	

Correct FCC OET-69 Analysis Output for WEDH-DT with Respect to WUVN-DT

45A	NY	NEW YORK	DTVPLN	DTVP1309	PLN
46A	ME	POLAND SPRING	DTVPLN	DTVP1330	PLN
46A	PΑ	ALLENTOWN	BMPCDT	20041029AHC	CP
47A	M M	WORCESTER	DTVPLN	DTVP1362	PLN
45A	CT	NORWICH	USERRECORI	001	APP

Percent new IX = -0.1126%

Worst case new 1X -0.0333% Scenario 1

FINISHED FINISHED FINISHED FINISHED FINISHED

Incorrect FCC OET-69 Analysis Output for WEDH-DT with Respect to WUVN-DT

1990 Census data selected

TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 07-11-2006 Time: 12:02:26

Record Selected for Analysis

WEDHOT USERRECORD-01 NORWICH CT US

Channel 45 ERP 465. kW HAAT 505. m RCAMSL 00604 m

Latitude 041-42-13 Longitude 0072-49-57

Status APP Zone 1 Border

Dir Antenna Make CDB Model 00000000065933 Beam tilt N Ref Azimuth 0.

Last update Cutoff date Docket

Comments Applicant

Cell Size for Service Analysis 0.8 km/side

Distance Increments for Longley-Rice Analysis 0.50 km

Facility meets maximum height/power limits

Azimuth	ERP	HAAT	41.0 dBu F(50,90)
(Deg)	(kW)	(m)	(km)
0.0	407.385	539.8	108.8
45.0	376.232	545.6	108.5
90.0	431.227	566.3	111.0
135.0	374.143	563.0	109.5
180.0	42.410	462.6	84.8
225.0	26.450	464.1	81.7
270.0	88.801	448.1	89.1
315.0	431.674	452.6	102.4

Evaluation toward Class A Stations

No Spacing violations or contour overlap to Class A stations

Class A Evaluation Complete